

Attorneys for Defendant Tezos Stiftung

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GGCC, LLC, an Illinois Limited Liability Company, Individually and on behalf of all others similarly situated,

Plaintiff,

V.

DYNAMIC LEDGER SOLUTIONS, INC., a Delaware Corporation, TEZOS STIFTUNG, a Swiss Foundation, KATHLEEN BREITMAN, an individual, and ARTHUR BREITMAN, an individual,

Defendants.

Case No. 3:17-cv-06779-RS

**JOINT STIPULATION AND
[PROPOSED] ORDER CONTINUING
THE CASE MANAGEMENT
CONFERENCE**

1 Pursuant to Local Rules 6-2 and 7-12, Plaintiff and Defendants, through their counsel,
2 submit the following Joint Stipulation and [Proposed] Order Extending the Date for Continuing
3 the Case Management Conference.

4 WHEREAS, on November 26, 2017, Plaintiff commenced the above-captioned action by
5 filing a putative class action complaint, asserting claims under the Securities Act of 1933;

6 WHEREAS, on November 29, 2017, the Court issued an Order for Class Actions Subject
7 to Private Securities Litigation Reform Act (PSLRA) and ADR Deadlines [ECF. No. 5], setting
8 the Initial Case Management Conference for March 1, 2018, at 10:00 AM and providing that, if
9 the Initial Case Management Conference is continued, the other deadlines are continued
10 accordingly;

11 WHEREAS, on December 4, 2017, the Instant Action was deemed related to actions
12 entitled *Okusko v. Dynamic Ledger Solutions, Inc. et al.*, 17-cv-06829, and *Baker v. Dynamic*
13 *Ledger Solutions, Inc., et al.*, 17-cv-06850 (the “Related Actions”), and such actions were
14 assigned to the Hon. Richard Seeborg;

15 WHEREAS, on January 25 and 26, 2018 four motions to consolidate this action with the
16 Related Actions and five applications to be appointed lead plaintiff were filed with the Court and
17 set for hearing on March 1, 2018 [ECF Nos. 38, 49, 53, 55, 61];

18 WHEREAS, on January 5, 2018, Plaintiff and defendants Dynamic Ledger Solutions,
19 Inc. (“DLS”) and Kathleen Breitman and Arthur Breitman (the “Breitman Defendants”) agreed
20 and stipulated that DLS and the Breitman Defendants shall not be required to move to dismiss or
21 otherwise respond to the Complaint filed in the Instant Action until 30 days after the Court
22 appoints a lead plaintiff and lead counsel, and lead plaintiff files and serves a consolidated
23 complaint or notice stating that lead plaintiff designates a previously filed complaint as operative
24 [ECF No. 21];

25 WHEREAS, on January 29, 2018, Plaintiff and defendant Tezos Stiftung (the
26 “Foundation”) agreed and stipulated that the Foundation should respond to the Complaint on the
27 same schedule as DLS and the Breitman Defendants [ECF No. 66];
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1 WHEREAS, the Foundation does not consent to, and in fact contests, the Court's exercise
2 of personal jurisdiction over it as well as the propriety of venue of this action;

3 WHEREAS, Defendants anticipate moving to dismiss any consolidated or otherwise
4 operative complaint;

5 WHEREAS, the undersigned have conferred regarding issues of timing;

6 WHEREAS, in light of the fact that the Court has not yet resolved consolidation of this
7 action with the Related Cases and a lead plaintiff and lead counsel have not yet been appointed
8 and in light of the PSLRA discovery stay, the parties respectfully submit that the Initial Case
9 Management Conference be adjourned, in the interest of judicial economy, to a date at the
10 Court's convenience after the Court rules on the pending motions for consolidation and appoints
11 a lead plaintiff and lead counsel; and

12 NOW, THEREFORE, in consideration of the foregoing and in the interest of judicial
13 economy and good cause shown, the parties stipulate, subject to the approval of the Court, the
14 following:

15 1. The March 1, 2018 Initial Case Management Conference will be adjourned and
16 taken off calendar and will be rescheduled after the Court appoints a lead plaintiff and lead
17 counsel.

18 2. Nothing in this stipulation constitutes a waiver of any defenses.

19 3. Nothing in this stipulation shall prejudice the right of any party to seek further
20 extensions on the consent of the other parties or from the Court.

21 IT IS SO STIPULATED.
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1 Dated: February 5, 2018

Respectfully submitted,

2 DAVIS POLK & WARDWELL LLP

3
4 By: /s/ Neal A. Potischman

5 Neal A. Potischman (SBN 254862)
6 Serge A. Voronov (SBN 298655)
7 1600 El Camino Real
8 Menlo Park, California 94025
9 Telephone: (650) 752-2000
Facsimile: (650) 752-2111
neal.potischman@davispolk.com
serge.voronov@davispolk.com

10 Edmund Polubinski III (*pro hac vice*)
11 Andrew S. Gehring (*pro hac vice*)
12 DAVIS POLK & WARDWELL LLP
13 450 Lexington Avenue
14 New York, New York 10017
15 Telephone: (212) 450-4000
16 Facsimile: (212)-701-5800
17 edmund.polubinski@davispolk.com
andrew.gehring@davispolk.com

Attorneys for Defendant
Tezos Stiftung

18 Dated: February 5, 2018

BAKER MARQUART LLP

19
20 By: /s/ Scott M. Malzahn

21 Brian E. Klein (258486)
22 Scott M. Malzahn (229204)
23 2029 Century Park East, Suite 1600
24 Los Angeles, CA 90067
25 Telephone: (424) 652-7814
26 Facsimile: (424) 652-7850
27 bklein@bakermarquart.com
28 smalzahn@bakermarquart.com

Attorneys for Defendants
Dynamic Ledger Solutions, Inc.,
Kathleen Breitman and Arthur Breitman

1 Dated: February 5, 2018

COOLEY LLP

2
3 By: /s/ Jeffrey M. Kaban

Patrick E. Gibbs (183174)
Jeffrey M. Kaban (235743)
Samantha A. Kirby (307917)
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5355
Facsimile: (650) 618-0387
pgibbs@cooley.com
jkaban@cooley.com
skirby@cooley.com

4
5
6
7
8
9
10 Daniel L. Sachs (294478)
1299 Pennsylvania Ave. NW Suite 700
Washington, DC 20004
Telephone: (202) 728-7114
Facsimile: (202) 842-7899
dsachs@cooley.com

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12
13
14 *Attorneys for Defendant*
Dynamic Ledger Solutions, Inc.

15
16 Dated: February 5, 2018

LITE DEPALMA GREENBERG, LLC

17
18 By: /s/ Jeremy Nash

Joseph J. DePalma, Esq.
Bruce D. Greenberg, Esq.
Jeremy Nash, Esq.
570 Broad Street, Suite 1201
Newark, NJ 07102
Telephone: (973) 623.3000
Facsimile: (973) 623.0858
jdepalma@litedepalma.com
bgreenberg@litedepalma.com

19
20
21
22
23
24 William R. Restis, Esq. (SBN 246823)
THE RESTIS LAW FIRM, P.C.
550 West C St., Suite 1760
San Diego, CA 92101
Telephone: (619) 270-8383
Facsimile: (619) 752.1552
william@restislaw.com

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26
27
28 *Attorneys for Plaintiff*

FILER'S ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I, Neal A. Potischman, attest that concurrence in filing this document has been obtained from the other signatories.

Dated: February 5, 2018

/s/ Neal A. Potischman

Neal A. Potischman

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: _____

HONORABLE RICHARD SEEBORG
U.S. DISTRICT JUDGE